Dear Mr. Karney,

After review of the documentation provided by DOE, and in consultation with some of our Sponsors and other efficiency stakeholders, the Northeast Energy Efficiency Partnerships, Inc. recommends that DOE adopt the proposed three-zone alternative for the new ENERGY STAR windows, doors and skylights specification.

While both the three- and four-zone alternatives have merit, we believe that the proposed three-zone alternative is preferable for several reasons:

- It is generally consistent with the current ENERGY STAR specification in regards to the number and location of the climate zones. This will minimize confusion among retailers, contractors and consumers when the new specification becomes effective.

- The fewer number of zones will also assist in the new specification’s more rapid acceptance by retailers and contractors.

- The greater cooling and peak demand savings of the three-zone approach are a critical benefit. Further, the larger electricity savings from the three-zone approach will translate into greater reductions in greenhouse gas emissions, consistent with ENERGY STAR’s mission.

Thank you for the opportunity to participate in this on-going process.

Glenn Reed
Residential Program Manager

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